

Additional developments that are already approved for the area are going to add more traffic to an already bad situation. I would recommend not allowing campground development until rating improves to the level Caltrans says its shooting for which is D or better.

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Page 30 pp6. There is allot of demand for recreation opportunities in the Lake Tahoe area, but is it OK to make more campgrounds because of demand at the expense of natural resources. I've seen full campsites that were mere parking lots of asphalt. Does that mean there was a natural resource people were recreating in? No it just meant that there was demand for parking space. Did people in there RV's come outside? NO!! They sat inside and watched TV on their satellite dish. Have they added more land to California? There seems to be more demand!!

The U.S. Forest Service in the Basin has reduced available campsites to a small handful due to NEPA and Lahontan regulations and the need to protect natural resources.

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Page 31pp2. Currently there are 500 campsites in 4 State Parks. 200 campsites would increase total campsites in Tahoe Basin State Parks by one third. Not bad for a small campground. In fact it would be the largest in the system!!

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Page 33pp2. Placing the campground on the middle of the 2,000 acre park prevents most people from walking or biking into town. Placement of the campground closer to Tahoe City would make foot and or bike traffic more likely to occur. Current proposed campground locations will have most campers driving their RV's into town increasing congestion and decreasing air quality.

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Page 39 Guidelines. Develop programs and policies as needed to protect and manage special status species consistent with natural resource management policies and priorities in the natural resource section of the DOM. What does this mean? where is the natural resource section? and who or what is the DOM??? Needs a great deal of clarification. Does the CTC Dollar parcel contain these special status species?? Should the entire CTC Dollar parcel be made into a natural preserve?? I believe it meets the criteria!!

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Page 40 Vegetation Management. Preservation and perpetuation of representative examples of natural plant communities are statewide mandates for the department. Yet we will adjust threshold indicators to allow development of CTC Dollar parcel and BCSP. I don't feel the BCSP did a very good job of educating the public on past or current management activities in the park. What was with the 8 foot road relocation in Antone Meadows and why was that so critical?? Was there a need to disturb?? It will be many years before this area looks natural again !!!

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Page 41 Include all species that are locally important (including endemic species), whether or not they appear on any endangerment list, as well as those protected by

state or federal law. It is important to recognize that this means environment and habitat associated with this animal as well a migratory access if necessary. The main problem is finding rare things!! Rare means it is hard to find and may not be found just because you looked once or allot, but just because you don't find it right away doesn't mean its not there!!

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Page 44 Guidelines. Attempts should be made to reduce the net area of hardened surfaces (foundations, paving etc.) Making the Campground access road as short as possible will dramatically reduce hardened surface as well as reduce construction cost. Put employee housing and facilities in places where they won't have to drive for services.

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Page 44 Water Quality. The plan says " New projects or new/increased visitor use within the park must be evaluated to insure that they do not contribute to degradation of surface and ground water quality, and I assume quantity as far as surface water is concerned. The new well in the highlands is of questionable supply. When the well was drilled it had to be doubled in order to give an adequate flow. The amount of water underground and available for this well will soon be tested when the new tank is built. In the spring when the pumps are turned on the surface water quickly diminishes until the pumps are turned off, then the flow slowly increases until the pump is turned on again. Installing a campground will require a water system and it will be likely that it to will take water away from the surface. The problem is that the geology of this area is mostly volcanic vesicular basalt. This kind of geology is known for its lack of underground water and dependence on surface water. We must not forget that the north shore was once used as a sewage processing plant by pumping raw sewage up from Tahoe City to the Cinder Cone west of Mt. Watson. If we disturb the underground water too much we might find out what happened to that sewage!! Also the Park will have to provide flush toilets at their 200 site campground this will cause increased load on the local sewage treatment plant on the Truckee River and will increase the chance of a leak or spill into the park or eventually Lake Tahoe. Highlands Creek has already been contaminated by sewage leak as well as a diesel spill from the high school.

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Page 49 Carrying Capacity. PRC 5001.96 and 5019.5 provide basic direction that carrying capacities are considered as part of any park facility development. Carrying capacity is important but not defined in PRC. It is feared that the carrying capacity for BCSP and the CTC Dollar parcel may have already been exceeded and that additional visitors will increasingly degrade the recreation experience and environmental integrity of the park.

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Page 50 Impacts on carrying capacity can be reduced or avoided by taking management actions and initiating proper mitigation measures. I don't believe this to be true but usually management believes it can work. If you have too many people using an area that is 14% of the land area on the north shore in California this will have a cumulative degrading effect on 100 % of the open space available. I find the phrase "regional coverage requirements and TRPA threshold standards will be

evaluated" discouraging. Why wouldn't they be followed? Or complied with?? Everyone else must obey them!!

43.33 Page 51. Roads and trails "Increase visitor safety and enjoyment when exploring the park." Several of the "new and Improved " trails have decreased visitor safety by lining the trails with large rocks and logs which make it extremely dangerous to pull off the trail to allow others to pass. The horse I met on my mountain bike did not appreciate it even though I bailed off the side. If the horse had tried to leave the trail it and the rider could have been injured on the large sharp rocks lining the trail. These trails need to be modified before making trail heads and parking areas.

43.34 Page 53. Evaluate the current capacities of the road and trail system to provide a quality visitor experience, while implementing facility upgrades to make current and future programs accessible to the general public. I haven't seen a park employee on the new trails since they have been completed. Complete appropriate studies to provide a greater understanding of planning issues for development projects in the park, including campgrounds and trails. They should take into account potential impacts of facilities and visitation increases on the resource base, the relationship of the new facilities to those already existing, access and traffic loads on feeder roads, as well as those within the park. Please take time to do this because if you overload this area with people you will cause many more problems that cannot be reversed.

43.35 Page 61 I recommend lowering the number of campsites to be between 1-50. Anything over 100 campsites will be an environmental and social disaster. How many campsites per restroom? How many restrooms in a 50 campsite campground?? How many water spigots and restrooms in a 100 campsite campground??

43.36 Planning Zone #3- The Dollar parcel. I feel that the intent of CTC acquisition of the Dollar Parcel was to protect it from development. The alternative road access and alternative campground locations placed within the Dollar parcel would go against the direction and purpose of the CTC acquisition. The Dollar parcel should be considered for Natural Preserve Zone status especially when it comes to proposed new development. The CTC acquires land to protect it from development , this includes two lane paved roads and campgrounds with restrooms and dumpsters every 50 feet. My impression of campgrounds has been a beautiful site for my tent close to my car with a beautiful view of a lake, but what happens is that someone thinks they reserved that site last Christmas and wants you to move. You search around and fortunately locate a Park Ranger. He tells the other camper that he has reserved a campsite but its the one next to your campsite. At approximately 2:10 AM people camped on the other side of you arrive from drinking at the casinos. They immediately start chopping firewood and turn on their radio -- loud. Camping can have such magical moments!! I feel that this is not what the CTC has in mind for the Dollar parcel.

Page 62 I would recommend the Dollar Parcel for classification as a natural preserve, considering it contains Goshawk, pine marten, olive sided flycatcher, willow flycatcher, and California spotted owl. These are animals that I have observed or heard

personally in the Dollar parcel. Other rare and animals that would be endangered by paved roads and increased vehicle traffic would be reptiles such as the rubber boa and terrestrial garter snake. These snakes need there habitats intact (not traversed by paved roads and numerous campground loops) in order to maintain viable breeding populations.

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Page 64 pp3. Environmental Analysis. This is supposed to be a key statement about what is critically important and I believe it does not make sense without the word "prevent" put in between the words might and them in the sentence and changing the word "implementation" to implementing and the sentence makes sense!! I feel that the report should not contain incomplete sentence structure when trying to explain what is critically important in the EIR!! Is this gov speak??

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Page 66pp2. I don't see a building or facility management plan!! What will that be under? Another plan or combined management plan from the four focused management plans?? "Some of the provisions of these focused management plans as well as development, maintenance, facility use, and recreational activities allowed by the General Plan have the potential to impact the environment. Prior to taking any action, CSP must evaluate whether that action constitutes a "project" under CEQA, whether it is categorically exempt (for example routine maintenance), whether it may have a significant impact on the environment and if so, whether a negative declaration or an EIR needs to be prepared." This appears to be an important point but I wasn't able to determine who is the "CSP" ? They are not listed in the ACRONYMS section! This must be clarified since CSP decides whether any of this is even a "project" and whether there will be "significant" environmental impacts. There may be the appearance of a conflict of interest if the State Parks determines whether there is need for EIR or not, or even if there activities are even projects in need of review.

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Page 67pp3. " Potential significant environmental impacts are those commonly associated with facility development and visitor use." Isn't this what the General Plan proposes?? Campgrounds and roads are facilities that will increase visitor use in a major way. "Potential adverse impacts identified in this plan include disturbance to or loss of natural and cultural resources" The BCSP's mission is to protect and perpetuate natural and cultural resources. This plan proposes to go against the "Mission Statement" of the reason BCSP was acquired and determined that the implementation of this plan would have " Effects found insignificant"!! How can this be true? How many protected and sensitive species are known within BCSP and CTC Dollar parcel ?? How many Miles of Paved 2 lane road and Campground loops will be constructed for a campground of 50 sites? 100 sites? 200 sites? How many restrooms per campgrounds of different sizes? How many campfires adding smoke to the air every evening and morning when the diurnal winds are down hill and down canyon towards Lake Tahoe and surrounding subdivisions. Air quality in Tahoma has always suffered from the smoke from campfires in General Creek Campground. The smoke tends to slide down the hillsides from evening till mid morning and can be trapped by inversion in the atmosphere and accumulate at the lower elevations near Lake Tahoe? Air quality was one of the key thresholds that was mentioned but not

addressed except by vehicles and housing facilities!! I don't believe air quality can be mitigated except to severely limit overnight camping, cabins and yurts. Will Campground toilets be flush type? Will the toilets be connected by pipeline to PUD's sewer system?? What are the environmental consequences of pipeline rupture or pump failure? Do State Park Campgrounds pay into TOT funds?? The only water quality issue brought up under the plan is erosion. Use of water for campgrounds and facilities could deplete surface water and could endanger the creeks and sensitive habitat as underground water tables are depleted.

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Page 78 Water Quality Resources. Non-point sources of water quality that are not addressed are leaks and emissions from automobiles and heavy equipment. Many RV's have self contained toilets and waste holding tanks. These tanks can be accidentally emptied or damaged during parking operations. The tanks on RV's probably contain chemicals and some human waste that will have a cumulative effect on water quality over time because shit happens!! "Development and maintenance of the following facilities could create significant adverse impacts." "New campground with yurts and cabins- New developed trailheads- Entrance, visitor, and maintenance roads- Trails, including trail connections and associated support facilities (trailheads- parking areas and rest rooms) - Interpretive exhibits/facilities-- Rehabilitation of areas where the landscape has been disturbed --Administrative buildings. Leaking or broken sewer lines are point source but must be recognized and located. This has already happened on Polaris Road in the Highlands subdivision when a large sewer pipe broke under road fill and had run down Highlands Creek toward Lake Tahoe for several years before my kids found it and said something smells down there and you need to look at it. When I reported it to the TCPUD they took prompt action. The sewer line that broke was the one that serves North Tahoe High School so I'm sure the volume was large and not just residential. A few years later the high schools diesel tanks failed and dumped their contents over the road and into the same drainage towards the Lake.

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Page 80 pp5. Mitigation measures -- "To avoid potential impacts to water quality, park visitors will be restricted from entering sensitive habitat areas, including wetlands, riparian areas, and stream beds, by use of fencing and signage" This amount of fencing and signage would spoil the aesthetics and the nature of these special places with fence and sign pollution!! Installation of the fences could alter or damage these sensitive areas. U.S. Forest Service used log fencing to protect the endangered Tahoe Cress on its beaches from visitors, but the log fence changed wind flow and shade and modified the microclimate in these areas nearly eliminating them from inside the log barriers. Now some very unesthetic steel post and wire fence protects the areas where they used to be and hopefully they will come back. This is an example of how mitigation measures may not have the effect that was predicted.

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Page 81. Unavoidable Significant Environmental Effects. Traffic. First of all traffic on highway 28 near Tahoe city is at the lowest traffic flow rating Caltrans has. Any worse and we would have gridlock and road rage. Yet we must develop and add more traffic to a highway whose carrying capacity of vehicles has been exceeded. OK we mitigate by eliminating an existing campground (already disturbed and over developed area)

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and build a new campground farther away requiring new disturbance and new construction to an area that contains many protected and sensitive species and we will fix it by mitigating. Tahoe will suffer again at the hands of those willing to develop and make money from its beauty and rationalize that there is No Significant Environmental impact. Again in the plan there is no recognition of cumulative impacts. As you add more vehicles the probability of breakdown or collision increases and on a LOS F road this can have serious consequences. Parking is already overrun at rim trail trailheads in the Basin and the need for restroom facilities is emerging at these trailheads.

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82 Growth- inducing impacts- If a sign was placed on or near one of the closed gates providing information on access park visitation would increase. Let alone have a road with a parking area near one of those closed gates. Complete development of all proposals will exceed the carrying capacity of BCSP and will have a cumulative

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environmental impact that will threaten to eliminate at least ten sensitive or protected animals from the park by altering their habitat. These animals have been pushed into smaller and smaller areas as increased development gobbles up useless open space in the race to make more money from a rapidly expanding human population.

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Page 83 Alternative 1 - No Project -- Can a no project alternative be passed as part of the 20 year general plan?? Can trailheads be developed without 200 campsites and who's knows how many dumpsters. Current "unmanaged, resource destructive recreation would continue to occur on the Dollar Parcel." I feel that full development of the preferred alternative will cause much more cumulative resource destruction just in the construction of the Dollar parcel than what is currently occurring by local residents riding their bikes and walking on existing trails. I think the author of this paragraph wants to vilify the locals for using the public land in a manner that has minimal impact and will occur regardless of what plan alternative is selected. Approximately 25 years ago the Tahoe World newspaper did a story about the recreational activity at the end of Old County Road. In the interview with those recreating near the area of the Dollar Parcel it was brought out that most of the recreation there at the time was related to uncontrolled motocross riding in the area and showed a motocross bike and rider in mid air. It is interesting how recreation has changed in a short time. After the story about the motocross riders there was no letter to the editor saying that this could have a negative effect on the natural environment. These past practices have left trails that are not acceptable today. Hopefully development of BCSP and CTC Dollar parcel will not fall into the same dilemma. If only we knew then what we know now could come back to haunt developers of BCSP.

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Page 85 Alternative 2-- Minimum Recreation/Maximum Resource Protection and Management -- I support the development of this alternative except the removal of the cross country ski area. Agencies such as the U.S. Forest service have determined that over the snow vehicles cause little enviromntal disturbance. Winter recreation events and activities are tolerated by wildlife. The orienteering event has caused significant environmental degradation and litter. There are many orienteering markers made out of plywood that were never remove and left as litter and when the event ended there

was no attempt to remove or pick up any litter. This alternative allows the BCSP to acquire the CTC Dollar parcel and to mitigate current environmental problems on the Dollar parcel. Although the California State Parks system will not contribute to badly needed campsites in California and the Lake Tahoe Basin it appears that camping shortage just like traffic will increase and by developing campsites in this area would not significantly reduce the over demand for California or Tahoe resources.

Alternative 2 will also keep protected species and their habitats intact and will serve the mission of the California Tahoe Conservancy to open land to the public but to protect its natural resources. Many would like to make a quick buck off of the development of this area but, in the long run preservation of this areas unique environmental qualities can reap rewards in the soul and spirit in perpetuity. I also agree that the General plan states that "facility construction and visitor use are those most likely to cause Significant Environmental Effects." The general plan would significantly increase visitor use and involves major facility construction. This goes against what the general plan says will happen and the finding of "Effects found not to be significant" in the environmental analysis.

43.51 Page 85 Cumulative Impacts. "The facility development proposed in the General Plan may result in impacts to cultural resources, sensitive species, wildlife habitat, water quality, and visual resources. This would have a significant environmental impact due to the cumulative effect this would have on all resources in BCSP.

43.52 Page 86 Growth has been slow due to environmental concerns and restrictions imposed by TRPA and Lahontan Regional Water quality Control Board. So this means that BCSP should go against the purpose of the growth and environmental restrictions as long as we can meet the letter of the law and mitigate various irreversible consequences of development. " To the extent that water Quality degradation and the loss of biological, cultural and visual resources is occurring in the region (especially in Nevada and Placer counties) any loss, disturbance, or degradation of these resources would contribute to cumulative impacts to these resources. I see no guarantee that any mitigation has or will restore lost sensitive species habitat or contaminated ground and surface water or restore air quality due to a hundred of campfires every morning and evening. Mitigation looks to me to be a bait and switch scheme. A way of rationalizing resource damage. What are the 36 TRPA environmental indicators that are not currently in compliance and decline and will mitigation bring them back into compliance?? Probably not!! So we will find new indicators and levels and lower the bar of environmental quality until we have mitigated it all and rationalized its commercialization justifying it by increased demand and mission statements.

43.53 Page 87 Air Quality. I think you missed it on this one!! One thing camping in campgrounds involves is a campfire!! Campfires in the evening help prevent bites from mosquitoes and allow for campfire cooking and light and warmth. Unfortunately the times when campfires are burned the atmospheric stability is the greatest and the smoke is not mixed into the free air of the upper atmosphere but stays low to the ground and is transported downhill by diurnal winds. (see Pascals atmospheric stability chart) The mitigation of putting new burning units with secondary burners that

reduce particulate matter would have little effect on the campfire at every campsite. The smoke from campfires is transported down slope and down canyon towards Lake Tahoe and surrounding subdivisions where it can be trapped by an inversion layer in the atmosphere holding the smoke in the area until the inversion breaks around 11:00 AM. This campfire smoke has effected air quality in the Tahoma area and can be seen early in the morning when driving highway 89 through Tahoma. Other land management actions proposed in the General Plan will have a cumulative effect on air quality such as fuels reduction projects, broadcast burning, pile burning, and RV's going to and from campgrounds.

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Page 88 Hazards-- " The project would not release hazardous substances, create a health hazard, expose people to any existing sources of health hazards, or increase a fire hazard." There are a few more hazards out there that you realize!! Currently there are thousands of dead trees. These dead trees are called snags. Snags are dead and do not have healthy roots or solid structure. Increased visitor use especially from other parts of the country will not recognize snags as a hazard. More forest workers are killed every year by snags than all other causes. I did not see an evaluation of how many snags per acre exist in the park but I'm sure its quite high in certain areas. The project will not increase the fire hazard but increased visitor use will increase the probability of ignition to a fire hazard. BCSP and the Dollar parcel are located on the north shore of Lake Tahoe, the mountains rise up towards Watson Peak. This gives slopes in BCSP a south aspect. In the Northern hemisphere south aspects receive the most direct sunlight and solar heating. A raise in temperature of 10 degrees Fahrenheit doubles the reaction intensity of forest fuels to fire. Predominant daytime wind flow in the area is from the southwest. This wind flow would assist fire in its preheating and rate of spread and intensity. The combination of topography, forest fuels, and wind are called the fire behavior triangle. The problem with BCSP and the Dollar parcel is that all of the parts of the fire behavior triangle are in alignment. This is a cumulative effect on fire behavior and resistance to containment and control (see Campbell Fire Prediction system). What about Hanta virus and bubonic plague?? Aren't these potential health hazards??

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Utilities and Service systems. "The project recommends new facility development (including campground development, trailhead parking and restroom facilities) that will require additional utilities and service systems." The increase required will be provided by local utility services. Sierra Pacific will have to install underground power lines as is required by TRPA for new development. TCPUD will have to increase capacity to its sewer treatment plant as it currently is approaching maximum capacity. New water tanks will have to be installed above the campground because pumping water uphill against pressure is expensive.